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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor LoanCare, LLC | CASE NO.: 19-12523-MBK CHAPTER 13 HEARING DATE: July 14, 2020 JUDGE: Chief Judge Michael B. Kaplan |
| In Re: Irene M Heyler, Debtor, | |

**RESPONSE TO DEBTOR'S MOTION TO REINSTATE THE AUTOMATIC STAY AS
TO CREDITOR LOANCARE, LLC**

COMES NOW, LoanCare, LLC ("Secured Creditor"), by and through undersigned counsel, hereby files its Response to Debtor's Motion to Extend the Automatic Stay and, in support thereof, states as follows:

1. Secured Creditor holds a mortgage on the property located at 174 Marlboro Rd, Old Bridge, New Jersey 08857.
2. On February 6, 2019, Debtor filed a Voluntary Petition for Bankruptcy pursuant to Chapter 13 of the United States Bankruptcy Code.
3. On April 28, 2020, an Order granting Motion for Relief from Stay was granted.
4. On June 15, 2020, Debtor filed a Motion to Reinstate Stay as to Secured Creditor.
5. Secured Creditor opposes Debtor's Motion to Reinstate the Automatic Stay as the Debtor currently owes Secured Creditor post-petition arrears in the sum of \$7,297.43 and the loan is contractually due for February 2019 – July 2019.
6. Secured Creditor has received no funds or payments since stay relief was granted.

7. As such, the stay as to Secured Creditor should therefore not be reinstated as to do so would cause a great injustice to Secured Creditor and would serve to prevent Secured Creditor from excising it legal and equitable remedies against the subject property.
8. Secured Creditor reserves the right to amend and or supplement this response prior to the hearing.

WHEREFORE, Secured Creditor respectfully requests entry of an order denying Debtor's Motion to Reinstate the Automatic Stay as to Secured Creditor and all further relief this Court deems just and proper.

Dated: July 7, 2020

RAS Citron, LLC
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 973-575-0707
By: /s/Aleisha C. Jennings
Aleisha C. Jennings, Esquire
Email: ajennings@rasnj.com

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CERTIFICATION OF SERVICE AND PROOF OF MAILING

I, Aleisha Jennings, Esq.:

■ represent the movant in the above-captioned matter.

On July 7, 2020 I sent a copy of the following pleadings and/or documents to the parties listed in the chart below: Response to Debtor's Motion To Extend The Automatic Stay

I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: July 7, 2020

By: /s/Aleisha C. Jennings
Aleisha C. Jennings, Esquire
Email: ajennings@rasnj.com

| Name and Address of Party Served | Relationship of Party to Case | Mode of Service |
|---|-------------------------------|--|
| Camille J Kassar Law Offices of Camille Kassar, LLC 271 Route 46 West Suite C-102 Fairfield, NJ 07004 | Debtor(s) Attorney | <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*) |
| Trustee Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853 | Trustee | <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*) |
| Irene M Heyler 174 Marlboro Rd Old Bridge, NJ 08857 | Debtor(s) | <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*) |
| U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102 | U.S. Trustee | <input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*) |

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.